

July 11, 2014

Mr. Jeff Killelea
Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

Sent electronically to: industrialstormwatercomments@ecy.wa.gov

RE: Comments on Ecology's Draft ISGP and WPPA's Draft ISGP Guidance Manual

Dear Mr. Killelea:

The Port of Longview appreciates the challenges faced by the writers of the Industrial Stormwater General Permit (ISGP) and the effort Ecology has expended to address them. However, we continue to be concerned about the impact of this permit on our operations and to industry generally in the State of Washington. Please consider our comments below, regarding the draft ISGP and WPPA's draft WA State Marine Terminal AKART and ISGP Corrective Action Guidance Manual.

1. Consider adding the following qualifying footnote (or equivalent) to S4.B.2.c: "This requirement applies to affected discharge points, i.e. those into impaired water bodies, those that serve processes triggering the numeric criteria, and/or those otherwise designated by Ecology." This should protect permittees with either discharges into both clean and impaired receiving waters / reaches, and/or discharges into separate waters with different impairments.
2. The effluent turbidity limit for discharge into an impaired waterway is a significant departure from the existing ISGP and would significantly impact our port. It may also be unnecessary – for example, when an offending discharge may be shown to have no effect on the receiving water turbidity. Thus, Ecology should consider including an alternate (performance-based) criteria similar that in Table 200 (1)(e) of their Surface Water Quality Standards.
3. By openly excluding most of the permit's costs from its Economic Impact Analysis (EIA) in Table 4, Ecology is remiss in considering the intent and of WAC 173-226-120 and under-represents the cost of this permit to the public and their representatives. According to the EIA's executive summary, "Ecology has determined annualized compliance costs might be \$500-\$1,300 for small businesses and \$1,000 - \$2,500 for large businesses." They go further, adding "In all typical cases analyzed, costs to comply are no higher than 0.11% of sales." Again, these estimates exclude most requirements, including all BMPs, all technical, management, and administrative functions not related to sampling/inspection, the annual permit fee, third-party allegations, and the almost inevitable costs of corrective actions – which are significant, especially relative to the actual environmental or business benefit.



4. The Port supports the proposed Marine Terminal AKART and ISGP Corrective Action Guidance Manual, and appreciates the work of Ecology, WPPA, and all our Port partners in this effort.

Thank you for the opportunity to comment on the draft ISGP and Marine Terminal AKART and ISGP Guidance manual. We look forward to continued cooperation with Ecology to protect surface water in a way that is both affordable and effective.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa A. Hendriksen', written over a horizontal line.

Lisa A. Hendriksen
Director of Planning and Environmental Services
Port of Longview